

Law Offices of David S. Secrest  
A Professional Corporation  
David S. Secrest, Esq. [State Bar #142299]  
504 Plaza Alhambra, Suite 205  
P. O. Box 1029  
El Granada, CA 94018-1029  
Tel: 650-726-7461  
Fax: 650-726-7471  
Attorney for Plaintiff  
Timothy Sanocki

UNITED STATES DISTRICT COURT  
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

TIMOTHY SANOCKI,  
Plaintiff,

v.

SERCO GROUP PLC, SERCO, INC. DE,  
PAUL CARPMAEL, an individual, RAQUEL  
SANCHEZ, an individual, KEITH HULBERT,  
an individual, MIKE HENRY, an individual,  
and DOES 1-50, inclusive,  
Defendants.

) Case No. CV 08-2740 MHP

) **STIPULATION FOR CONTINUANCE**  
) **OF HEARING ON PLAINTIFF**  
) **TIMOTHY SANOCKI'S MOTION FOR**  
) **REMAND, AND FOR COSTS;**  
) **PROPOSED ORDER**

) Current Date: October 20, 2008  
) Requested Date: November 17, 2008  
) Time: 2:00 p.m.  
) Courtroom 15, 18th Floor  
) Complaint Filed: July 30, 2007  
) Removal: May 30, 2008

**STIPULATION FOR CONTINUANCE OF HEARING ON**  
**PLAINTIFF TIMOTHY SANOCKI'S MOTION FOR REMAND, AND FOR COSTS**

The Court has ordered a hearing on PLAINTIFF TIMOTHY SANOCKI'S MOTION FOR REMAND, AND FOR COSTS, now set for October 20, 2008, at 2:00 p.m., in Courtroom 15, the Honorable Judge Marilyn Hall Patel, presiding.

The parties have reached a tentative settlement in this case as a result of discussions that occurred after the Court issued said Order, and after the matter was fully briefed by the parties.

As a result, the parties wish to continue the hearing on said motion as settlement is finalized, until a date that has been suggested by the Court, which is November 17, 2008, at 2:00

1 p.m., in Courtroom 15.

2 The parties hereby so stipulate, and respectfully request the Court accept the Stipulation.

3 DATED: October 17, 2008

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6 /s/ David S. Secrest

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8 David S. Secrest  
9 Attorney for Plaintiff  
10 Timothy Sanocki

11 DATED: October 17, 2008

12 Seyfarth Shaw LLP

13 /s/ Dana Peterson

14 \_\_\_\_\_  
15 Dana Peterson  
16 Attorney for Defendants  
17 Serco Group PLC, Serco, Inc., Raquel Sanchez, Keith Hulbert, Mike Henry

18 THE FOREGOING STIPULATION IS APPROVED AND IS SO ORDERED.

19 DATED:

20 Hon. Marilyn H. Patel  
21 Judge, United States District Court, Northern District of California

